

AO 91 (Rev. 08/09) Criminal Complaint

**SEALED****FILED**

## UNITED STATES DISTRICT COURT

NOV 15 2023

for the

Northern District of Oklahoma

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

United States of America

v.

RONALD GENE WADE JR

Case No. 23-MJ-631-JFJFILED UNDER SEAL

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 9, 2023, to November 13, 2023 in the county of Tulsa in the  
Northern District of Oklahoma, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 115(a)(1)(B)

Threatening to Assault, Kidnap, or Murder a United States Judge

18 U.S.C. 2261A(2)(B)

Cyberstalking

This criminal complaint is based on these facts:

See Attached Affidavit by FBI SA Zachariah Balser

☒ Continued on the attached sheet.Zachariah Balser

Complainant's signature

Special Agent Zachariah Balser

Printed name and title

Sworn to before me by phone.

Date:

11/15/23Jodi Jayne

Judge's signature

City and state:

Tulsa, OKJODI F. JAYNE, United States Magistrate Judge

Printed name and title

**Affidavit in Support of an Arrest Warrant  
in the Northern District of Oklahoma**

I, Zachariah Balser, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn under oath, do hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent of the Federal Bureau of Investigation, United States Department of Justice, and as such, I am an investigative or law enforcement officer who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code. I am presently assigned to the Oklahoma City Field Office, Tulsa Resident Agency, Safe Streets Task Force (SSTF). As part of my duties as a Special Agent, I investigate criminal violations relating to federal criminal law and threats to national security. In addition to formalized training, my investigations include, but are not limited to, drug and gang violations, public corruption, white collar crimes, violent crimes, crimes against children, computer intrusion, threatening communications, stalking, and cyberstalking committed within the Northern District of Oklahoma.

2. As a result of my training and experience as an FBI Special Agent, I am familiar with Federal criminal laws. I know that the following are violations of federal law:

- a. Title 18, United States Code 115(a)(1)(B) – Threatening to assault, kidnap, or murder a United States Official – is violated by any person who threatens to assault, kidnap, or murder a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under section 1114 of Title 18, with

intent to impede, intimate, or interfere with such official judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties.

- b. Title 18, United States Code 2261A(2)(B) – Cyberstalking – is violated by any person who with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person.

3. The facts and statements in this affidavit are based in part on information provided by other law enforcement officers, including the United States Marshals Service, and on my personal observations and training and experience as a Special Agent with the FBI. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter or the facts upon which it is based. I have set forth only the facts which I believe are necessary to assist in the issuance of a Complaint and to establish probable cause to believe that violations of Title 18, United States Code, Sections 115(a)(1)(B) and 2216A(2)(B) were committed by RONALD GENE WADE JR.

#### **PROBABLE CAUSE**

4. In 2018, RONALD GENE WADE JR (WADE) began filing multiple civil cases in the Northern District of Oklahoma against various defendants, outlining a broad array of alleged criminal violations. Since that time, WADE has sent hundreds



of emails, letters, faxes, and court filings filled with profanity generally directed at local city, state, and federal officials. WADE's communications, while harassing, did not include clear threats of violence until a recent escalation presumably related to restrictions placed on his ability to make federal court filings.

5. In January 2021, WADE, acting in a pro se capacity, filed a Chapter 7 Voluntary Petition in the U.S. Bankruptcy Court for the Northern District of Oklahoma, in an effort to stall foreclosure on his property.

6. In June of 2021, the Chief Judge of the U.S. Bankruptcy Court for the Northern District of Oklahoma (Federal Bankruptcy Judge #1), entered a final decree against WADE in the administration of his property.

7. In May 2022, WADE filed a civil case against 44 named defendants, to include, the United States of America, the State of Oklahoma, the current governor of Oklahoma, and the Mayor of Tulsa. The civil case named approximately 58 alleged criminal violations, to include: torture, conspiracy to commit continued acts of slavery, "conspiracy to cover-up a fabricating cop", violation of the 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup> 7<sup>th</sup> 13<sup>th</sup> and 14<sup>th</sup> amendments, etc. The matter was filed in the U.S. District Court for the Northern District of Oklahoma and assigned Case Number 22-CV-209-JLK-JFJ (hereinafter, the "District Court Matters").

8. On July 28, 2022, the Court entered an Order in the District Court Matters, which outlined possible filing restrictions that it would impose upon WADE if he continued to file frivolous pleadings. Subsequently, WADE filed another similar action.

9. On October 27, 2023, the Court entered General Order 23-09 in connection with the District Court Matters, which implemented the previously outlined filing restrictions. The Order was signed by all four District Judges in the Northern District of Oklahoma (NDOK), herein after referred to as Federal District Judges #1, #2, #3, and #4.

10. On November 9, 2023, approximately two weeks following entry of the Order, the United States Marshal Service (USMS) for the Northern District of Oklahoma received a faxed letter from WADE that named Federal District Judges #1, #2, #3, and #4. On the top of the page of the fax was WADE's information: "From Ronald Wade 1.539.202.5127 Thu Nov 9 13:36:24 2023 MST page 1 of 1." In addition to several aggressive comments, WADE asserted: **"It's open game on paleface judges assholes unless they pay 2.8 billion so tell them to kiss their asshole goodbye as a corrupt motherfucker."**

11. On November 9, 2023, Federal Bankruptcy Judge #1's chambers received a correspondence purporting to be from a local attorney named Ron Barber. That correspondence was from WADE. Therein, WADE advised: **"To The Federal Court – Fuck You & I'm Going to Assign Your Asses Into Slavery & You Dicklicking Motherfuckers Get No Opinion, But Keep On Pretending ... Your Mouth & Brain Have Been Extinguished & Your Dick is Next & I Would Recommend You Publicly Exonerate & Admit Your Crimes, Before the Ropes Come Out."**

12. On November 10, 2023, WADE sent an email correspondence from “ron wade <rgwade323@gmail.com>” to more than 170 recipients, to include local attorneys, public officials, and members of the United States Attorney’s Offices for both the Eastern and Northern Districts of Oklahoma (USAO). Based upon my training and experience, I know that e-mail communications travel through different Internet Service Providers that maintain out-of-state and interstate routing servers. The correspondence included language that depicted a notable escalation in graphic violence and sexual nature directed towards the victims. In addition to several aggressive comments, the correspondence contained an assertion that named all four NDOK District Judges and stated that they **“Will All Be Publicly Buttfucked As A Deterrent To All...”**

13. On November 11, 2023, WADE sent another email correspondence from “Roy Mercer <popknot323@yahoo.com>” to several recipients, to include members of the USAO, local officials, and members of the local legal community. The correspondence was directed to Federal District Judges #1, #2, #3, and #4 by name, and included the following threat: **“It's Open Game On The Assholes Of Baby Faced Bynum, Kevin Stitt, [Federal District Judge #1], [Federal District Judge #4], [Federal District Judge #3], [Federal District Judge #2]... You just rape them ...”**

14. On November 11, 2023, WADE sent another email correspondence from “bogey66r@aol.com” to several recipients, to include members of the USAO and the



local legal community. This e-mail is another commonly used by WADE and known to law enforcement. The correspondence began immediately by naming, among others, Federal District Judges #1, #2, #3, and #4, and included the following threat against them, **“...who defers to females as a bigger God, will smack your federal corrupt slavemasting ass back to kingdom come and your bullets have been relabeled asshole boomerangs and substance is required to work through the physics that allows thermodynamics to reroute the bullet to circle the flank and enter your asshole at butt plug speed or thwump and if you fired 20 bullets, each one hits the butt plug dead center and drives it in, then it slides back to plug level, while putting you in horrendous pain, 20 more times...”**

15. On November 13, 2023, WADE sent another email correspondence from “bogey66r@aol.com” to several recipients, to include members of the USAO, local municipal officials, and the Oklahoma Attorney General’s Office. The correspondence included the following, **“...politicians and judges are called bitches and whores of the worker drones and you fucked with the wrong Pro Se and your asshole gets stretched.”**

16. On November 13, 2023, WADE sent another email correspondence from “bogey66r@aol.com” to several recipients, to include members of the USAO, local municipal officials, members of the local legal community, and the Oklahoma Attorney General’s Office. The correspondence included the following, **“...these federal judges exceeded their authority and are getting their assholes snatched as a**

**deterrent to the forked tongued palefaces, that you have nothing to promote and have no vested position in anything.”**

17. On November 14, 2023, the FBI learned that members of the judiciary had become aware of these correspondences, as many had been directed to members of the USAO, the Bankruptcy Court, and prominent law firms in and around Tulsa. These communications represent a marked escalation in an already concerning pattern of conduct. Unlike WADE’s prior communications with the Court during the pendency of the District Court Matters, these latest messages made targeted threats of violence. WADE’S conduct flows immediately from adverse judgments rendered in both the U.S. Bankruptcy Court of the Northern District of Oklahoma and the U.S. District Court for the Northern District of Oklahoma.

18. In summary, WADE’s letters, faxes, and emails threatened to assault, kidnap, or murder Federal Bankruptcy Judge #1 and Federal District Judges #1, #2, #3, and #4, with the intent to impede, intimidate, or interfere with the judges while they were engaged in the performance of official duties, and with intent to retaliate against the judges for the performance of their official duties. Further, WADE, having the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate the aforementioned five United States Judges, used electronic communication services, electronic communication system of interstate commerce, and other facilities to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause emotional distress to the five United States Judges.



CONCLUSION

Based on the information set forth in this affidavit, I submit there is probable cause to believe that RONALD GENE WADE JR has violated 18 U.S.C. §§ 115(a)(1)(A) Influencing, Impeding or Retaliating Against a United States Judge and 2261A(2)(B) Cyberstalking.

Respectfully submitted,

*Zachariah Balser*

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Zachariah Balser  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn via phone on the 15<sup>th</sup> day of November 2023.

*Jodi F. Jayne*

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HON. JODI F. JAYNE  
UNITED STATES MAGISTRATE JUDGE